

ATTACHMENT 12

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Norfolk Southern Corporation and Norfolk Southern Railway Company ("Norfolk Southern") will take the videotape deposition of GAC Holdings, LLC and GAC, LLC (collectively "GAC") upon oral examination on January 28, 2008 at 9:00 am at the offices of Gallivan, White & Boyd, PA, 55 Beattie Place, Suite 1200, P.O. Box 10589, Greenville, SC

29603, before an officer authorized by law to administer oaths. The matters on which examination is requested are as follows:

1. The purchase by GAC of properties previously owned by Avondale Mills, Inc. or its affiliates in and around Graniteville, South Carolina, and elsewhere in Aiken County, South Carolina.
2. The negotiations surrounding the aforesaid purchases by GAC.
3. The Asset Sales Agreement reflecting the aforesaid purchases by GAC.
4. The provisions of the Asset Sales Agreement relating to liability for possible environmental remediation at or around the properties acquired by GAC in the aforesaid purchases.
5. All discussions and information obtained by GAC concerning the environmental problems if any relating to the properties acquired by GAC in the aforesaid purchases, including but not limited to:
 - a. the contaminants of concern;
 - b. the remedial measures contemplated to remedy such contamination;
 - c. the proposed or estimated costs of such remedial measures;
 - d. "Phase 1 and Phase 2 environmental assessments" or their equivalents obtained in relation to said properties.
6. The specific boundaries of the properties acquired by GAC in relation to other properties acquired from Avondale Mills, Inc. by Community Environmental Company, LLC and/or other companies or entities affiliated with the general partners of GAC.

7. The reasons for and process of dividing the acquisitions from Avondale Mills, Inc. between GAC and Community Environmental Company, LLC and other entities.
8. Discussions or conversations or exchanges of correspondence that any of the partners of GAC have had with Stephen Felker, Sr. or Stephen Felker, Jr. concerning any possible future business involvements together or any present business involvements together other than relating to the sale of properties by Avondale Mills, Inc.

Deponent is directed to bring with him the documents described in Attachment A hereto.

Dated: January 9, 2008



W. Howard Boyd, Jr. (Fed. I.D. #1431)

Phillip E. Reeves (Fed I.D. #3232)

Ronald K. Wray, II (Fed I.D. #5763)

Ronald G. Tate, Jr. (Fed. I.D. #4021)

Jennifer E. Johnsen (Fed. I.D. #5427)

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ATTORNEYS FOR DEFENDANTS NORFOLK
SOUTHERN CORP. AND NORFOLK
SOUTHERN RAILWAY COMPANY

ATTACHMENT A

1. All environmental assessments relating to the properties at issue, including but not limited to “phase 1 and phase 2” environmental assessments that have been performed in relation to such properties.
2. All notes or other documents reflecting or containing communications between or among GAC and Avondale Mills, Inc. in relation to GAC’s acquisition of said properties.
3. All notes or other documents reflecting or containing communications between or among GAC principals and Stephen Felker, Sr. and/or Stephen Felker, Jr. concerning other business activities among them.

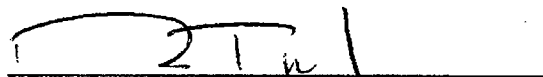
PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Norfolk Southern Corporation and Norfolk Southern Railway Company ("Norfolk Southern") will take the videotape deposition of Community Environmental Company, LLC ("CEC") upon oral examination on January 28, 2008 at 9:00 a.m. at the offices of Gallivan, White & Boyd, PA, 55 Beattie Place, Suite 1200, P.O. Box 10589, Greenville, SC 29603, before an officer authorized by law to administer oaths. The matters on which examination is requested are as follows:

1. The purchase by CEC of properties previously owned by Avondale Mills, Inc. or its affiliates in and around Graniteville, South Carolina, and elsewhere in Aiken County, South Carolina.
2. The negotiations surrounding the aforesaid purchases by CEC.
3. The Asset Sales Agreement reflecting the aforesaid purchases by CEC.
4. The provisions of the Asset Sales Agreement relating to liability for possible environmental remediation at or around the properties acquired by CEC in the aforesaid purchases.
5. All discussions and information obtained by CEC concerning the environmental problems if any relating to the properties acquired by CEC in the aforesaid purchases, including but not limited to:
 - a. the contaminants of concern;
 - b. the remedial measures contemplated to remedy such contamination;
 - c. the proposed or estimated costs of such remedial measures;
 - d. "Phase 1 and Phase 2 environmental assessments" or their equivalents obtained in relation to said properties.
6. The specific boundaries of the properties acquired by CEC in relation to other properties acquired from Avondale Mills, Inc. by GAC Holdings, LLC and/or GAC, LLC and/or other companies or entities affiliated with the general partners of CEC.
7. The reasons for and process of dividing the acquisitions from Avondale Mills, Inc. between CEC and GAC, LLC and GAC Holdings, LLC, and other entities.

8. Discussions or conversations or exchanges of correspondence that any of the partners of CEC have had with Stephen Felker, Sr. or Stephen Felker, Jr. concerning any possible future business involvements together or any present business involvements together other than relating to the sale of properties by Avondale Mills, Inc.

Deponent is directed to bring with him to the deposition the documents identified on Attachment A hereto.

Dated: January 9, 2008



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3. All notes or other documents reflecting or containing communications between or among CEC principals and Stephen Felker, Sr. and/or Stephen Felker, Jr. concerning other business activities among them.

